

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

FILED**AUG 22 2011**Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

LJUBICA RAJKOVIC
ZMAJA OD NOCAJA 13c/5
11000 BEOGRAD, SERBIA

— PLAINTIFF PRO SE

vs.

FEDERAL BUREAU OF INVESTIGATION (F.B.I.)
J. EDGAR HOOVER BUILDING
935 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20535-0001, U.S.A.

U.S. DEPARTMENT OF JUSTICE
OFFICE OF INFORMATION POLICY (OIP)
1425 NEW YORK AVENUE, N.W.
SUITE 11050

WASHINGTON, DC 20530-0001, U.S.A.

— DEFENDANTS ET AL.

CIVIL ACTION

No.

Case: 1:11-cv-01508

Assigned To : Collyer, Rosemary M.

Assign. Date : 8/22/2011

Description: FOIA/Privacy Act

RECEIVED**AUG 16 2011**Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

COMPLAINT

1. THE PLAINTIFF IS A FORMER RESIDENT OF MASSACHUSETTS, NOW RESIDING OVERSEAS IN BEOGRAD, SERBIA (EUROPE).
2. THE DEFENDANT FEDERAL BUREAU OF INVESTIGATION (F.B.I.) IS A FEDERAL AGENCY IN THE DISTRICT OF COLUMBIA (U.S.A.).
3. THE DEFENDANT U.S. DEPARTMENT OF JUSTICE, AS PART OF THE FEDERAL JUDICIAL BRANCH, IS ALSO IN THE DISTRICT OF COLUMBIA (U.S.A.).
4. THIS COURT HAS JURISDICTION OVER THIS COMPLAINT PURSUANT TO 28 U.S.C. § 1346 (b)(1), ARTICLE III SECTIONS 2-3 AND THE AMENDMENTS XIII AND XIV OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, AND 5 U.S.C. § 552 (a)(4)(B), AS WELL AS 18 USCS § 242.

5. THE PLAINTIFF MADE HER TWO IDENTICAL FOIA LETTER REQUESTS ON APRIL 22, 2009 AND MAY 30, 2009 TO THE F.B.I. FIELD OFFICE IN BOSTON, MASSACHUSETTS [EXHIBIT 1], BUT HAVE RECEIVED TWO DIFFERENT RESPONSES FROM THE F.B.I. OFFICE IN WASHINGTON, DC, SIGNED BY THE SAME EMPLOYEE, AND DATED JULY 10, 2009 AND MAY 8, 2009.

6. DEFENDANT F.B.I.'S RESPONSE OF JULY 10, 2009 DENIED PLAINTIFF'S FOIA REQUEST BECAUSE

"THE QUESTIONS POSED IN THE REFERENCED LETTER ARE NOT FOIA REQUESTS BECAUSE THEY DO NOT COMPLY WITH THE FOIA AND ITS REGULATIONS" [EXHIBIT 2],

WHEREAS THE SECOND RECEIVED RESPONSE OF MAY 8, 2009 ASKED FOR MORE INFORMATION FOR PURPOSES OF "ACCURATE SEARCH".

7. PER GIVEN INSTRUCTIONS, THE PLAINTIFF MADE HER "MODIFIED" FOIPA REQUEST INSTEAD OF HER INITIAL FOIA REQUEST PERTAINING TO HERSELF AS A SUBJECT ON FEBRUARY 19, 2010 [EXHIBIT 3], WHICH WAS ALSO DENIED ON APRIL 13, 2010 DUE TO DEFENDANT F.B.I.'S INABILITY TO "IDENTIFY RESPONSIVE MAIN FILE RECORDS" AND THE EXEMPTIONS FROM DISCLOSURE 2 AND 7(E) -- 5 U.S.C. §§ 552(6)(2) AND (6)(7)(E) [EXHIBIT 4].

8. THE PLAINTIFF MADE HER APPEAL ON JUNE 18, 2010 AND THE DEFENDANTS, U.S. DEPARTMENT OF JUSTICE MADE ITS DETERMINATION ON MAY 23, 2011 CONFIRMING THE DEFENDANT F.B.I.'S DENIAL DECISION [EXHIBIT 5].

9. HOWEVER, THE PLAINTIFF ARGUES THAT ALL THREE DEFENDANTS' DENIALS ARE ILLEGAL AND MADE IN BAD FAITH DUE TO THE FOLLOWING UNLAWFUL POLICY USED BY THE DEFENDANTS:

a) THE DEFENDANTS DID NOT USE LEGALLY REQUIRED FORMS FOR THE FOIA / PA REQUESTS.

b) THE DEFENDANTS HAVE INTENTIONALLY AND IN FULL KNOWLEDGE DEALT WITH THE ILLEGALLY CONSTRUED AND FORMULATED FOIPA REQUEST PROVIDED TO THE PLAINTIFF.

c) THE OFFICIAL DEFENDANT F.B.I.'S REPLIES TO THE PLAINTIFF WERE RELEASED FROM WASHINGTON, DC, BUT THE FOIA / PA REGULATIONS REQUIRE MAILING TO ANOTHER ADDRESS FOR REQUESTS' PROCESSING.

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d) THE DEFENDANT F.B.I. DID NOT USE ADEQUATE RECORDS SEARCH NEITHER IN ITS SCOPE NOR IN ITS METHOD MANUALLY AND/OR BY AUTOMATED MEANS, BECAUSE THE PLAINTIFF PARTIALLY OBTAINED SAME FOIA RECORDS IN THE YEAR 2000.

ACCORDINGLY, PURSUANT TO THE SAME LAW PROVISIONS, THE PLAINTIFF'S CLAIM CAN NOT BE DISMISSED ON THE GROUNDS OF THE DEFENDANTS' INABILITY TO LOCATE RECORDS.¹

e) THE PLAINTIFF NEVER MADE ANY REQUESTS FOR INFORMATION CONCERNING HER OR ANY "INDIVIDUAL'S PLACEMENT ON ANY GOVERNMENT WATCH LIST". FURTHERMORE, THE DEFENDANTS' DENIAL ON THE GROUNDS OF 5 U.S.C. §§ 552(b)(2), AND (b)(7)(E) -- EXEMPTIONS 2 AND 7(E), DOES NOT DEMONSTRATE REAL AND RATIONAL NEXUS BETWEEN THE INFORMATION REQUESTED BY THE PLAINTIFF AND THE DEFENDANTS' PROPER LAW ENFORCEMENT PURPOSE IN THIS MATTER,² ESTABLISHED AND REQUIRED BY THE PRATT TEST.³

f) BY TOKEN THAT THE DEFENDANTS ENGAGED THEMSELVES IN THE UNLAWFUL POLICY, THE PLAINTIFF'S INITIAL FOIA LETTER REQUEST OF APRIL 22, 2009 IS MORE IN COMPLIANCE WITH THE FOIA REGULATIONS THAN THE DEFENDANTS' ILLEGAL GATHERING OF INFORMATION ON THE PLAINTIFF AS A SUBJECT. THUS, THE PLAINTIFF CLAIMS A CASE OF GOVERNMENT MISCONDUCT.

¹ SEE HAMMIE V. SOCIAL SEC. ADMIN., 765 F. Supp. 1224, 1226 (E.D. PA. 1991); SEE ALSO LINK V. U.S. DEP'T OF JUSTICE, No. 92-1406, 1995 WL 631847 AT **15-16 (D.D.C. Aug. 22, 1995).

² SEE, e.g., DAVIN V. U.S. DEP'T OF JUSTICE, 60 F. 3d 1043, 1056 (3d Cir. 1995) aff'd 176 F. 3d 471, 471 (3d Cir. 1999); KERN V. FBI, No. 94-0208, slip. op. at 9 (C.D. Cal. Sept. 14, 1998); BLANTON V. U.S. DEP'T OF JUSTICE, No. 93-2398, slip. op. at 5-8 (W.D. TENN. JULY 14, 1994); ROSENFELD V. U.S. DEP'T OF JUSTICE, 761 F. Supp. 1440, 1445-48 (N.D. Cal. 1991) aff'd in PERTINENT PART, REV'D IN PART AND REMANDED 57 F. 3d 803 (9th Cir. 1995); FRIEDMAN V. FBI, 605 F. Supp. 306, 321 (N.D. GA. 1984).

³ SEE PHE, 983 F. 2d at 249, 251, 253; SEE PRATT, 673 F. 2d at 420-21; QUINON, 86 F. 3d at 1228; SHAW, 749 F. 2d at 63; LESAR, 636 F. 2d 487,

10. THE PLAINTIFF FURTHER SUPPORTS HER CLAIM OF GOVERNMENT-LED - MISCONDUCT WITH THE EVIDENCE OF HER PRIVATELY SUBMITTED SIMILAR INQUIRY TO THE FOREIGN MINISTRY OF INTERIOR IN BELGRADE, SERBIA, COINCIDING WITH HER FOIA REQUEST IN THE U.S. DESPITE THEIR REJECTION OF BOTH OF HER INQUIRIES, INTENSIVE COMMUNICATIONS BETWEEN THE CORRESPONDING AGENCIES AND THE DEPARTMENTS OF THE TWO COUNTRIES BEGAN IN FEBRUARY 2010, INCLUDING MR. ROBERT S. MUELLER III, DIRECTOR OF THE DEFENDANT F.B.I.'S OFFICIAL HEARTLY GREETINGS AND WISHES FOR FURTHER CO-OPERATION "IN THE MUTUAL INTEREST OF BOTH COUNTRIES", SENT TO THE SERBIAN SECRETARY OF INTERIOR, MR. IVICA ĐAČIĆ, FOR THE OCCASION OF THE CELEBRATION OF 200 YEARS OF THE SERBIAN MINISTRY OF INTERIOR HELD IN SAVA CENTER, BELGRADE ON JANUARY 21, 2011 AT 8 P.M. [EXHIBITS AVAILABLE UPON REQUEST]. CURRENT INVOLVEMENT EXTENDS TO THE U.S. DIPLOMATS.
11. THUS, THE PLAINTIFF'S CLAIM ALSO EXTENDS TO ALL DEFENDANTS' DOMESTIC AND FOREIGN LIAISON NETS, INCLUDING PRIMARILY THE CIA AND THE PRIVATE CIA, AS WELL AS THE INFORMANTS THROUGHOUT THE WORLD, IMMEDIATELY AFFECTING THE PLAINTIFF WITH NOT-AUTHORIZED ON-GOING SURVEILLANCE, COVERT ACTIONS, AND PLAY WITH HER AS A TARGET, CREATING LIFE THREATENING AND/OR DEGRADING SITUATIONS COMPRISING EXECUTION OF BRUTAL, PERSISTENT, AND PERPETUAL HARASSMENT AND DISCRIMINATION OF ALL TYPES, INCLUDING THE AUDIO-VISUAL AND STREET HARASSMENT.
12. DESCRIBED ACTS ON PART OF THE DEFENDANTS, PRESENT SERIOUS AND DETRIMENTAL VIOLATIONS OF THE ARTICLE I SECTION 8 AND 10, ARTICLE II SECTIONS 2-4, ARTICLE III SECTION 3, ARTICLE IV SECTION 3, AND AMENDMENTS V, IX, XIII SECTION 1, AND XIV SECTION 1 OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, 28 U.S.C. § 1346 (b) (1), CRIMINAL PROVISIONS AGAINST ACTS UNDER COLOR OF LAW IN 18 USC § 242, THE PLAINTIFF'S NATURAL RIGHTS/"CIVIL LIBERTIES",⁴ CIVIL

⁴ SOWERS v Ohio CIVIL RIGHTS COM., 20 Ohio Misc 115, 49, Ohio Ops 2d 203, 252 NE2d 463.

RIGHTS,⁵ AND HER SOCIAL RIGHTS OR PRIVILEGES⁶ AS ESTABLISHED IN THE DECLARATION OF INDEPENDENCE.

WHEREFORE, TO THE EXTENT OF THE PLAINTIFF'S RIGHT TO AMEND HER COMPLAINT, SHE DEMANDS A FOLLOWING RELIEF AGAINST THE DEFENDANTS AS OF TODAY'S DATE:

- a) COMPENSATION FOR ALL DAMAGES INCLUDING POSSIBLE PLAINTIFF'S LOSS OF IDENTITY AND RECORDS, PERSONAL INJURY AND DEATH OF HER FAMILY MEMBERS CAUSED BY THE NEGLIGENT AND ILLEGAL ACTS BY THE DEFENDANTS' EMPLOYEES WITHIN THE SCOPE OF THEIR EMPLOYMENT;
- b) COURT ORDER FOR DISCLOSURE OF REQUESTED INFORMATION/RECORDS BY THE DEFENDANTS;
- c) PERMANENT WORLD-WIDE RESTRAINING AND NO-SURVEILLANCE COURT ORDER AGAINST THE DEFENDANTS AND THEIR DOMESTIC AND FOREIGN GOVERNMENT AND PRIVATE LIAISON NETS OF ALL TYPES INCLUDING THE INFORMANTS;
- d) CONGRESS AND SENATE PROSECUTION OF THE DEFENDANTS PURSUANT TO ARTICLE I SECTION 3 AND ARTICLE II SECTION 4 OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, AND 28 U.S.C. § 2403.



LJUBICA RAJKOVIĆ - PLAINTIFF PRO SE
ZMAJA OD NOĆAJA 13c/5
11000 BEOGRAD
SERBIA (EUROPE)

DATE: JULY 28, 2011

⁵ CAVER V CLARK (DC ARK) 78 F SUPP 295; ANTHONY V BURROW (CC KAN) 129 F 783; PAYNE V EMMERSON, 290 11L 490, 125 NE 329; PEOPLE EX REL. MALLER V BARRETT, 203 11L 99, 67 NE 742; BOARD OF EDUCATION V BOARD OF EDUCATION, 11 11L APP 20 408, 137 NE 2d 721; HAUPT V SCHMIDT, 70 IND APP 260, 122 NE 343, WINNETT V ADAMS, 71 NEB 817, 99 NW 681; STATE V COLLINS, 69 WASH 268, 124 P 903.

⁶ MCFARLAND V GOINS, 96 MISS 67, 50 SO 493; STATE EX REL. WEAVER V BOARD OF TRUSTEES, 126 OHIO ST 290, 185 NE 196.

Zmaja od Noćaja 13c
11000 Beograd, SERBIA
April 22, 2009.

Director/Chief Investigator
Federal Bureau of Investigation
JFK Federal Building
One Center Plaza
Suite 600
Boston, MA 02108
U.S.A.

URGENT

2ND MAILING

MAY 30, 2009

Dear Sir:

Under the Freedom of Information Act I wish to request information on the assistance given to me by your staff concerning the false arrest by a police officer in one of the suburban police stations in 1995/96. I would greatly appreciate if I could obtain the name of the agent who received my phone call at that time, has helped me to be released from jail immediately, and whom I was afraid to contact for further assistance because the police has named me "FBI INFORMER".

Although much time has passed, I sincerely hope that you will be able to further assist me. Yesterday, I have made an attempt to reach the FBI in this part of the world, but I am afraid that the security at the U.S. Embassy have kicked-me-out.

Since this is an urgent matter, I can be reached either by mail at the above address or by phone at 381.11.2631.712.

Your immediate attention regarding this request is appreciated in advance.

Sincerely,



Ljubica Rajković (Ms.)

> EXHIBIT 1 <



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535

July 10, 2009

Ms. Ljubica Rajkovic
Zmaja od Noca 13c
11000 Beograd
Serbia

Dear Ms. Rajkovic :

This is in reference to your Freedom of Information Act (FOIA) request submitted to the Boston Field Office. The FOIA does not require federal agencies to answer inquiries, create records, conduct research, or draw conclusions concerning queried data. Rather the FOIA requires agencies to provide access to reasonably described, nonexempt records. The questions posed in the referenced letter are not FOIA requests because they do not comply with the FOIA and its regulations.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. Hardy", is written over the typed name.

David M. Hardy
Section Chief
Record/Information
Dissemination Section
Records Management Division

> EXHIBIT 2 <



Federal Bureau of Investigation

Washington, D.C. 20535

May 8, 2009

MS. LJUBICA RAJKOVIC
ZMAJA OD NOCAJA 13C
11000
BEOGRAD
SERBIA

Request No. 1130362- 000
Subject RAJKOVIC, LJUBICA

Dear Ms. Rajkovic:

Your Freedom of Information/Privacy Acts (FOIPA) request received at the Boston Field Office is being returned. Your letter did not contain sufficient information to conduct an accurate search of the Central Records System.

Full Name: LJUBICA RAJKOVIC
Current Address: ZMAJA OD NOCAJA 13C, 11000 BEOGRAD, SERBIA
Date of Birth: 10/17/58 Place of Birth: BEOGRAD, SERBIA, YUGOSLAVIA
Daytime Telephone Number: 011.2631.712

Please provide any additional information that you think would assist the FBI with our search for records, such as prior addresses, employments, aliases, approximate time frame for the information sought.

^{AST} 1995-PRIOR ADDRESS IN MA: 4/2 PERRI & HUGH ERNISSE, 11 TAYLOR STREET, BOX 2146
1996 LITTLETON, MA 01460; PRIOR ADDRESS IN PA: 4/0 BORDANA KOSTIC, 321 S. 46TH ST
PHILADELPHIA, PA 19143 [1998/99 YEAR].

- SEARCHING FOR VERIFICATION OF ANY INFO. FOUND ON MY NAME IN BOTH STATES

Under penalty of perjury, I hereby declare that I am the person named above and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. § 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years, or both; and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of Title 5 U.S.C. § 552a(i)(3) as a misdemeanor and by a fine of not more than \$5,000. The signature must be legible.

Signature

Date

FEBRUARY 19, 2010.

To initiate your FOIPA request, please return the original request letter with the requested information. Please note that mail addressed to the FBI is delayed several weeks due to increased security procedures now in place

Sincerely yours,

⊗ ENCLOSURE

David M. Hardy
Section Chief
Record/Information
Dissemination Section
Records Management Division

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U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535

April 13, 2010

MS. LJUBICA RAJKOVIC
ZMAJA OD NOCAJA 13C
11000 BEOGRAD
SERBIA 538..RS/BEG

FOIPA Request No.: 1130362- 001
Subject RAJKOVIC, LJUBICA

Dear Ms. Rajkovic:

This responds to your Freedom of Information/Privacy Acts (FOIPA) request.

Based on the information you provided, we conducted a search of the indices to our Central Records System at the Boston Field Office. We were unable to identify responsive main file records. We were not able to search all of the manual indices because the Boston Field Office indices have been transferred to Headquarters and are not yet searchable. If you have additional information pertaining to the subject that you believe was of investigative interest to the Bureau, please provide us the details and we will conduct an additional search.

To the extent your FOIPA request seeks access to records that would either confirm or deny an individual's placement on any government watch list, please be advised that the U.S. Government can neither confirm nor deny whether a particular person is on any terrorist watch list. Maintaining the confidentiality of government watch lists is necessary to achieve the objectives of the U.S. Government, as well as to protect the privacy of individuals who may be on a watch list for a limited time and later removed. If the U.S. Government revealed who was listed on any government watch list, terrorists would be able to take actions to avoid detection by government authorities. Thus, pursuant to the Freedom of Information Act (FOIA) Exemptions 2 and 7(E), 5 U.S.C. §§ 552 (b)(2) and (b)(7)(E), the FBI can neither confirm nor deny the existence of certain records which would tend to indicate whether an individual is or ever was listed on any government terrorist watch list.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), U.S. Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, D.C. 20530-0001. Your appeal must be received by OIP within sixty (60) days from the date of this letter in order to be considered timely. The envelope and the letter should be clearly marked "Freedom of Information Appeal." Please cite the FOIPA Request Number in any correspondence to us for proper identification of your request

Enclosed for your information is a copy of the FBI File Fact Sheet

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. Hardy", is located below the "Sincerely yours," text.

David M. Hardy
Section Chief,
Record/Information
Dissemination Section
Records Management Division

Enclosure

> EXHIBIT 4 <



U.S. Department of Justice

Office of Information Policy

Telephone: (202) 514-3642

Washington, D C. 20530

MAY 23 2011

Ms. Ljubica Rajkovic
Zmaja od Noca 13c
11000 Beograd
SERBIA

Re: Appeal No. 2010-2680
Request No. 1130362-001
SRO:KRP

Dear Ms. Rajkovic:

You appealed from the action of the Federal Bureau of Investigation on your request for access to records pertaining to yourself.

The Freedom of Information Act provides for disclosure of many agency records. At the same time, Congress included in the FOIA nine exemptions from disclosure that provide protection for important interests such as personal privacy, privileged communications, and certain law enforcement activities. After carefully considering your appeal, I am affirming, on partly modified grounds, the FBI's action on your request. To the extent that your request seeks access to records that would either confirm or deny an individual's placement on any government watch list, I am affirming the FBI's action in refusing to confirm or deny the existence of any such records responsive to your request. The FBI properly refused to confirm or deny the existence of such information because such information, if it exists, is protected from disclosure under the FOIA pursuant to 5 U.S.C. § 552(b)(7)(E). This provision concerns records or information compiled for law enforcement purposes the release of which would disclose techniques and procedures for law enforcement investigations or prosecutions. This response should not be taken as an indication that records do or do not exist. Rather, this is the standard response made by the FBI.

As to any other records, the FBI informed you that it could locate no main files responsive to your request in its files. I have determined that the FBI's response was correct and that it conducted an adequate, reasonable search for records responsive to your request. Please be advised that I have determined that the FBI's manual indices in its Boston Field Office are still not searchable.

Please note that the FBI located a file pertaining to your civil litigation against the government, but it did not process this file because it is not an investigatory file, and you should already have copies of that litigation. If you wish to obtain additional copies of this file, I suggest that you make a new request directly to the FBI. The FBI will send any and all releasable records to you directly, subject to any fees.

> EXHIBIT 5 <

-2-

Please be advised that this Office's decision was taken only after a full review of this matter. Your appeal was assigned to an attorney with this Office who thoroughly reviewed and analyzed your appeal, your underlying request, and the actions of the FBI in response to your request.

Lastly, I note that in an undated letter addressed to the FBI, you stated that "[you] would greatly appreciate information on the available assistance provided to individuals trying to locate fugitives from law in court civil cases concerning child support." Please be advised that the FOIA does not require federal agencies to answer questions or to conduct research in response to a FOIA request, but rather is limited to requiring agencies to provide access to reasonably described, nonexempt records. See, e.g., Harrison v. BOP, 681 F. Supp. 2d 76, 83 (D.D.C. 2010).

If you are dissatisfied with my action on your appeal, the FOIA permits you to file a lawsuit in federal district court in accordance with 5 U.S.C. § 552(a)(4)(B).

Sincerely,

A handwritten signature in black ink, appearing to read "Janice Galli McLeod", written in a cursive style.

Janice Galli McLeod
Associate Director

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA1. Title of case (name of first party on each side only) RAJKOVIC LJUBICA V. F.B.I., ET AL.,

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- ☐ I. 160, 410, 470, 535, R.23, REGARDLESS OF NATURE OF SUIT.
- ☒ II. 195, 196, 368, 400, 440, 441-446, 540, 550, 555, 625, 710, 720, 730, 740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950. *Also complete AO 120 or AO 121 for patent, trademark or copyright cases
- ☐ III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371, 380, 385, 450, 891.
- ☐ IV. 220, 422, 423, 430, 460, 462, 463, 465, 480, 490, 510, 530, 610, 620, 630, 640, 650, 660, 690, 810, 861-865, 870, 871, 875, 900.
- ☐ V. 150, 152, 153.

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

N/A

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES ☐ NO ☒

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES ☒ NO ☐

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES ☒ NO ☐

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES ☐ NO ☐7. Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of D.C. District of Columbia ("governmental agencies"), residing in D.C. reside in the same division? - (See Local Rule 40.1(d)).YES ☐ NO ☐A. If yes, in which division do all of the non-governmental parties reside?Eastern Division ☐ Central Division ☐ Western Division ☐B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in D.C. reside?Eastern Division ☐ Central Division ☐ Western Division ☐

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES ☐ NO ☒

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME RAJKOVIC LJUBICA - PRO SEADDRESS ZMAJA OD NOCAJA 131/5, 11000 BEOGRAD, SERBIA (EUROPE)TELEPHONE NO. N/A